Federal Communications Commission
Washington, D.C. 20554

FCC 307

Approved by OMB
3060-0407
Expires 3/31/91

APPLICATION FOR EXTENSION OF BROADCAST CONSTRUCTION PERMIT OR TO REPLACE EXPIRED CONSTRUCTION PERMIT
(CAREFULLY READ INSTRUCTIONS ON BACK BEFORE COMPLETING)

For Commission Use Only
File No. BMPTT-910128SM

1. Legal Name of Applicant *(See Instruction C)*
Sangre de Cristo Communications, Inc.

2. Mailing Address *(Number, street, city, state, ZIP code)*
2200 Seventh Avenue
Pueblo, Colorado 81003

RECEIVED
JAN 28 1991
Federal Communications Commission
Office of the Secretary

Telephone No. *(Include Area Code)*
(719) 544-5781

3. PURPOSE OF APPLICATION:
[x] a. Additional time to construct broadcast station
[ ] b. Construction permit to replace expired permit

4. IDENTIFICATION OF OUTSTANDING CONSTRUCTION PERMIT:

File Number	Call Letters
BPTT-820413SI	K15BX
Frequency	Channel No.
--	15

Station Location: Colorado Springs, Colorado

5. OTHER:
Submit as Exhibit No. N/A a list of the file numbers of pending applications concerning this station, e.g., major or minor modifications, assignments, etc.

6. EXTENT OF CONSTRUCTION:

(a) Has equipment been delivered? [X] YES [ ] NO
If NO, answer the following:

From Whom Ordered *(If no order has been placed, so indicate)*

Date Ordered

Date Delivery Promised

(b) Has installation commenced? [X] YES [ ] NO
If YES, submit as Exhibit No. _____ a description of the extent of installation and the date installation commenced.

(c) Estimated date by which construction can be completed.
See Exhibit No. 1

7. (a) If application is for extension of construction permit, submit as Exhibit No. 1 reason(s) why construction has not been completed.

(b) If application is to replace an expired construction permit, submit as Exhibit No. _____ the reason for not submitting a timely extension application, together with the reason(s) why construction was not completed during the period specified in the construction permit or subsequent extension(s).

Are the representations contained in the application for construction permit still true and correct? [ ] YES [X] NO
If NO, give particulars in Exhibit No. 1

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Legal Name of Applicant	Signature
Sangre de Cristo Communications, Inc.	
Title: President	Date: 1/21/91

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT, U.S. CODE, TITLE 18, SECTION 1001.

Sangre de Cristo
Communications, Inc.
Exhibit No. 1

K15BX is currently operating pursuant to Special Temporary Authority and is rebroadcasting the signal of noncommercial educational television station KTSC-TV, Pueblo, Colorado, licensed to the University of Southern Colorado ("USC"). This operation makes possible continued provision of educational television service to portions of Colorado Springs which could not otherwise receive a satisfactory signal and which would otherwise have been lost due to the displacement of USC's television translator K53BO.

Extension of the construction permit will permit SCC to continue to rebroadcast KTSC-TV and thus to provide local educational television service to areas of Colorado Springs which would not otherwise be able to receive satisfactory service.

EXHIBIT 1

Ref. KM

AMENDMENT

The application of the University of Southern Colorado for a construction permit to improve the facilities of noncommercial educational television station KTSC-TV, Pueblo, Colorado (File No. BPET-900122KE) is hereby amended by the submission of the attached "Amendment to Request for Waiver".

Respectfully submitted

UNIVERSITY OF SOUTHERN COLORADO

By _____
President, University of Southern Colorado

By _____
Tom Aube, Chief Engineer

March 7, 1990

AMENDMENT TO REQUEST FOR WAIVER

This Amendment is submitted in order to clarify and embellish the request for waiver of the requirements of Section 73.610(b) of the Commission's Rules which is contained in Exhibit E-1A. This Amendment addresses the public interest considerations and other matters which support the waiver request, particularly in light of the formal opposition of MST which was filed on February 26, 1990.

The background of the current proposal is of extreme significance. The purpose of this proposal is to provide an adequate signal for the residents of Colorado Springs and its surrounding area from Station KTSC-TV, which is licensed to Pueblo. Pueblo and Colorado springs are considered a hyphenated market (the 99th major market) in the Arbitron listings (see, e.g., Broadcasting Yearbook '89, page C-157). More significantly, Colorado Springs is part of the area which the University of Southern Colorado was created to serve, not only by its broadcast station, but also by the various educational and outreach services which the University provides to that area of the State of Colorado.

The signal of Station KTSC-TV, with its present authorized facilities, partly because of the nature of the intervening terrain, is clearly inadequate to serve Colorado Springs. For this reason, the University has for a number of years operated a translator on Channel 53 to provide such service. The programming of Station KTSC-TV, during this period, has included numerous programs which dealt with Colorado Springs' issues and interests and which featured residents of Colorado Springs.

Unfortunately, the Commission has authorized a new full-power television station to operate on Channel 53 at Castle Rock, Colorado. When this station commences service, the Channel 53 translator will be forced to cease operation. When this prospect became known, the university conducted a thorough search for another UHF channel on which its translator could be operated. There are no such channels available. The University thereupon sought to inaugurate a rule making proceeding to allocate Channel 66 at Colorado Springs on a reserved basis. This effort also failed because the proposal violated the existing major market television freeze. The rule making was sought only after the University had determined that no UHF channel was available at or near Colorado Springs for the creation of a full-power satellite of Station KTSC-TV.

The University was thus confronted with the impending loss of the service which it has provided to Colorado Springs, and the financial support from Colorado Springs residents which is of significant importance to the entire broadcast operation. The instant application appears to provide the only possible mechanism

for the University to achieve its basic mission to provide educational service to all of the people of this area.

To serve the Colorado Springs and Pueblo markets with a VHF television signal there are only three site locations that can be considered, because of the local zoning restriction. The first site is the present transmitter site located on Baculite Mesa. This site does not allow sufficient signal penetration to provide adequate signal to the Colorado Springs market. Both Station KOAA-TV, Channel 5, and Station KTSC-TV share this site. Both KOAA and KTSC-TV have had to operate translator stations from Cheyenne Mountain to serve the Colorado Springs market.

The second site is a 1300-foot tall tower site located approximately 8 miles north of the Baculite Mesa site and approximately 1/2 mile south of the El Paso County line. The City of Colorado Springs is approximately 500 feet higher in elevation than the tall tower site. The distance from the tall tower site to the center of Colorado Springs is approximately 30 miles. The site is not acceptable for two reasons -- first, the distance and elevation differences from Colorado Springs will prevent a signal from this site to be received by the heavily populated areas located behind the many ridges that are a part of the Colorado Springs area; and, second, the fact that a very strong signal would be bounced off of Pikes Peak which is located west of Colorado Springs and received in Colorado Springs, would cause very bad ghosting of that signal in the Colorado Springs area. Even at its present location, Station KTSC's Channel 8 signal in Colorado Springs is very bad in some areas of the city because of this problem. Moving the transmitter and antenna closer to the mountain will only intensify the ghosting problem.

The Cheyenne Mountain site, therefore, is the only adequate site in the area. The antenna pattern has been carefully chosen so that no signal will be radiated toward Pikes Peak and because of the elevation of the site compared to Colorado Springs, a signal will be provided to the heavily populated ridges.

The only disadvantage of the Cheyenne Mountain site would be the high cost of the rent the University will have to pay but, it believes, as all of the renters on Cheyenne Mountain, that it is the only site that will provide the needed location.

EXHIBIT 2

Public Reference
Rm. 2

IN REPLY REFER TO:
8940-MLB

Thomas Aube
University of Southern Colorado
2200 Bonforte Blvd.
Pueblo, CO 81001

Re: Station KTSC(TV)
Pueblo, CO
BPET-900122KE

Dear Mr. Aube:

This is with respect to the above-captioned application of the University of Southern Colorado (University) for a modification of licensed facilities for noncommercial educational Station KTSC(TV), Channel 8, Pueblo, Colorado. Your application is opposed by the Association for Maximum Service Telecasters, Inc. (AMST), which filed an informal objection on February 26, 1990.

Your present transmitter site is located on Baculite Mesa, approximately eight miles north of Pueblo. Although Colorado Springs lies partly within the station's predicted principal community contour, intervening terrain prevents an adequate signal from reaching that community. Coverage of that community is important, you state, because of the various educational and outreach services the University offers there. Thus, until August 1990 you had utilized a television translator on Channel 53 to provide service to Colorado Springs, until forced off the air by a new full-power station on that channel. You state that you have been unable to find a new channel on which your translator could operate and that your modification application is an effort to find a site which could serve both Pueblo and Colorado Springs. You now propose to construct a tower on Cheyenne Mountain in an antenna farm southwest of Colorado Springs. That site is 296.1 kilometers (184.0 miles) from co-channel Station KJCT(TV), Grand Junction, Colorado, and 291.9 kilometers (181.4 miles) from the reference point for a co-channel allocation in Laramie, Wyoming. Section 73.610(b) requires a minimum separation of 304.9 kilometers (189.5 miles) in this part of the country. Accordingly, your proposed site is 8.8 kilometers (5.5 miles) short-spaced to Station KJCT(TV) and 13.0 kilometers (8.1 miles) short-spaced to the Laramie allocation. Accordingly you request waiver of the Rule. You also seek waiver of Section 73.685(e) of the Rules because the ratio of the maximum-to-minimum radiation of your proposed directional antenna would exceed 10 dB.

In support of your waiver request of Section 73.610, you argue that there are only three sites at which you could locate and provide a predicted signal to both Pueblo and Colorado Springs without running afoul of local zoning restrictions. The first is your present site, but you argue that intervening terrain prevents a viewable signal from reaching Colorado Springs. The second potential site is approximately eight miles north of your current site; however, operation from that site would result in severe ghosting. The third site is Cheyenne Mountain, which you have proposed. You state that the terrain

north and west of the proposed site is mountainous towards both Grand Junction and Laramie and that no objectionable interference would result. Additionally, you contend that you will afford equivalent protection to the Grand Junction station and a future co-channel station in Laramie.

In opposition, AMST argues that you have not made the threshold showing that no fully spaced sites, including its present site, are available. It further asserts that you have not made a compelling public interest justification necessary for waiver of the Rules.

After careful review of your application, we are persuaded that grant of your waiver requests would serve the public interest. The Commission is mindful of the unique role played by many noncommercial television stations in providing public television service to wide areas. You have established that the University serves both the Pueblo and Colorado Springs areas and that it is therefore important that your television station do so as well. You have unsuccessfully attempted to find another translator to serve Colorado Springs, and it would not be possible at this time to seek a new television channel, since there is currently a freeze on the filing of new applications in that part of the country. Further, it does not appear that you could modify the facilities of your current site sufficiently to provide a viewable signal in Colorado Springs. Consequently, your only alternative is to seek a new site, and we believe that you have demonstrated the unsuitability of any other sites from which you could serve both communities. We further note that, while there would be some loss areas to the south and east of Pueblo, these areas are largely unpopulated. Additionally, we agree that the mountainous terrain and your offer to reduce effective radiated power to the north and west would greatly reduce the possibility that objectionable interference to the Grand Junction station or to a future station in Laramie would occur. Finally, we note that Station KJCT(TV) in Grand Junction has not opposed your proposal. Therefore, we believe that waiver of Section 73.610 is warranted. We will also grant your request for waiver of Section 73.685, because the directional antenna pattern you propose would minimize the potential for ghosting. Additionally, that antenna pattern will enable you to provide the equivalent protection mentioned above.

Accordingly, for the reasons stated above, the informal objection filed by AMST IS DENIED, your requests for waiver of Sections 73.610 and 73.685 ARE GRANTED, and your application to modify the station's facilities IS GRANTED subject to the following conditions:

The maximum visual effective radiated power at azimuth 348 degrees True toward the Channel 8 allocation for Laramie, Wyoming, shall not exceed 21.3 dBk (135 kW).

The maximum visual effective radiated power at azimuth 278 degrees True toward Station KJCT(TV), Grand Junction, Colorado, shall not exceed 22.0 dBk (158 kW).

The application for license shall include:

a. Horizontal plane radiation pattern obtained from measurements performed by the manufacturer for the transmitting antenna prior to its installation.

b. Vertical radiation patterns obtained from measurements by the manufacturer for the transmitting antenna prior to its installation for at least the azimuth toward the Channel 8 allocation in Laramie and toward Station KJCT(TV).

c. An affidavit by a qualified and licensed surveyor that the proper azimuthal orientation of the transmitting antenna achieves radiation limitations prescribed above for the Channel 8 allocation in Laramie and Station KJCT(TV).

Sincerely,

Barbara A. Kreisman
Chief, Video Services Division
Mass Media Bureau

cc: Wayne Coy, Jr., Esq.
William H. Fitz, Esq.

EXHIBIT 3

NEWS

UNIVE ITY OF SOUTHERN COLORAI
Communication Services (719) 549-2219 Pueblo CO 81001-

FOR FURTHER INFORMATI

Sally McGill
Director

Sept. 3, 1992

KTSC-TV, KOAA-TV EXCHANGE CHANNELS

FOR IMMEDIATE RELEASE

PUEBLO, Colo. -- Officials at KTSC-TV (Channel 8), the public broadcasting television station licensed to the University of Southern Colorado, and KOAA-TV (Channels 5 and 30) have agreed to exchange channel frequencies.

John O. Gilbert, KOAA-TV president and general manager, said his television station, Sangre de Cristo Communications, Inc., will pay KTSC-TV $1 million in cash in exchange for the Channel 8 signal. The two stations also will exchange equipment which will result in a net gain for KTSC-TV of approximately $250,000.

KTSC-TV will receive KOAA-TV's dual main transmitter which currently serves Pueblo and dual translator which currently serves Colorado Springs.

Today USC's governing board, the State Board of Agriculture, approved the plan. Final approval authority, however, rests with the Federal Communications Commission.

Greg Sinn, KTSC-TV general manager, said he is delighted with the proposition.

- more -

"In my opinion," Sinn said, "John Gilbert and the staff of KOAA-TV have shown extraordinary support and professional consideration for public broadcasting in Southern Colorado.

"Because of the particular situations and needs of both stations," he explained, "the exchange ultimately will help both stations reach broader audiences with stronger signals."

In 1991, the FCC approved a plan for KTSC-TV to move its VHF signal to Cheyenne Mountain. However, the university has been unable to build the necessary transmission facilities there.

Acquiring KOAA's double translator in Colorado Springs would help KTSC-TV meet the objective to enhance service to the viewing area, and acquiring KOAA's double transmitter in Pueblo would strengthen KTSC-TV's signal and reliability in its primary service area.

Sinn said $150,000 of KOAA's payment for the exchange would be used to expand KTSC-TV broadcasts to Durango and Grand Junction, two areas which currently are not served by public broadcast television.

The university intends to use the remaining $850,000 of KOAA's cash payment to fund an endowment for KTSC-TV program acquisition and development. Sinn said the FCC will require that the funds from the exchange transaction be dedicated to public broadcasting.

KOAA-TV intends to invest $2,000,000 in new equipment and a new Channel 8 transmitter and antenna. The station also will build an installation on Cheyenne Mountain, where Channels 11, 13 and 21 currently have their transmitters and antennas.

The new Channel 8 signal from Cheyenne Mountain will improve KOAA-TV's television picture quality in Colorado Springs and maintain a quality picture in Pueblo and Southern Colorado.

Gilbert said that, since 1976 when he moved to Southern Colorado and began to manage the station, he and the KOAA-TV staff have invested a tremendous, continual effort and dedication to improving the station's service for its viewers.

Additionally, the station's corporation has invested $4.5 million in capital improvements to upgrade KOAA-TV's broadcasting facilities.

"KOAA-TV's news, community involvement and programming have received literally hundreds of awards for excellence," Gilbert noted.

In June 1992, the Colorado Broadcasters Association presented KOAA-TV with the Television Station of the Year award for the fifth consecutive year.

Gilbert said the exchange of Channels 5 & 30 for Channel 8 is one more significant effort to continue improvement of KOAA-TV's service to the Colorado Springs/Pueblo market.

He said Cohn & Dippell, a Washington, D.C. consulting engineering firm, is in charge of the engineering involved in the channel exchange, the Channel 8 installation on Cheyenne Mountain, and the installation of new translators in Southern Colorado to expand KTSC-TV's service area.

###

EXHIBIT 4

PUBLIC NOTICE

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

News media information 202/632-5050. Recorded listing of releases and texts 202/632-0002.

REPORT NO. 15344 BROADCAST ACTIONS September 8, 1992

STATE	FILE-NUMBER	CALL-LETTERS	APPLICANT + LOCATION	NATURE OF APPLICATION

THE COMMISSION, BY ITS MASS MEDIA BUREAU, ON AUGUST 27, 1992, GRANTED THE FOLLOWING APPLICATIONS FOR RENEWAL OF LICENSE INCLUDING SUBSIDIARY COMMUNICATIONS AUTHORITY (BACKGROUND MUSIC, ETC.), WHERE APPLICABLE:

CA BRED	-900731YV	KCPB	UNIVERSITY OF SOUTHERN CALIFORNIA	THOUSAND OAKS , CA	NON-COMMERCIAL EDUC. FM RENEWAL OF LICENSE
CA BRH	-900801YX	KGB-FM	KGB, INCORPORATED	SAN DIEGO , CA	FM STATION RENEWAL OF LICENSE
GA BR	-881129VU	WDAX	WDAX, INC.	MCRAE , GA	AM STATION RENEWAL OF LICENSE

THE COMMISSION, BY ITS MASS MEDIA BUREAU, TOOK THE FOLLOWING ACTIONS EFFECTIVE ON THE DATES SHOWN

ACTION OF: FEBRUARY 28, 1991

CO BPET	-900122KE	KTSC CHAN-8	UNIVERSITY OF SOUTHERN COLORADO PUEBLO , CO	APPLICATION GRANTED TO EDUCATIONAL TV BROADCAST STATION CP TO CHG. THE ERP VIS: 233.0 KW; HAAT:727.57 METERS; TL: SW OF C.S. ATOP CHEYENNE MOUNTAIN (38-44-41 104-51-37.5); ANT: JAMPRO JCR 8-8, (DA)(BT) ROBERT C. SHIRLEY, ESQ. *THIS APPLICATION IS GRANTED WITH CONDITIONS.(SEE FCC'S AUTHORIZATION FORM 352-A FOR CONDITIONS OR RESTRICTIONS)

-OVER-

EXHIBIT 5

ONE RAVINIA DRIVE
SUITE 1300
ATLANTA, GEORGIA 30346-2108
TELEPHONE (404) 395-0000
TELECOPIER (404) 395-0000
CABLE "DOWATL"
TELEX 4995255

WRITER'S DIRECT DIAL NO.

DOWNEY, COHNES & ALBERTSON
SUITE 1000
1255 TWENTY-THIRD STREET
WASHINGTON, D.C. 20037-1194

TELEPHONE (202) 857-2500
TELECOPIER (202) 857-2900
CABLE "DOWLA"
TELEX 425546

437 MADISON AVENUE
NEW YORK, NEW YORK 10022-7380
TELEPHONE (212) 326-3300
TELECOPIER (212) 326-3333
TELEX 277265

80 WEST STREET
ANNAPOLIS, MARYLAND 21401-2401
TELEPHONE (301) 263-0043

(202) 857-2786

July 23, 1990

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Sangre de Cristo Communications, Inc.
Television Translator K15BX
Colorado Springs, Colorado

Gentlemen:

On behalf of Sangre de Cristo Communications, Inc., we transmit herewith an application for the extension of its construction permit for Television Translator K15BX, Colorado Springs, Colorado. It should be noted that there is being filed an application for modification of the permit which will permit prompt institution of service.

There is no filing fee associated with this application.

Should there be any questions concerning this application, kindly contact this office.

Very truly yours,

Suzanne M. Perry

Suzanne M. Perry

SMP:cr
Enclosure

Federal Communications Commission
Washington, D.C. 20554

FCC 307

Approved by OMB
3060-0027
Expires 3/31/91

APPLICATION FOR EXTENSION OF BROADCAST CONSTRUCTION PERMIT OR TO REPLACE EXPIRED CONSTRUCTION PERMIT

(CAREFULLY READ INSTRUCTIONS ON BACK BEFORE COMPLETING)

For Commission Use Only
File No. BMPTT-900723IG

1. Legal Name of Applicant *(See Instruction E)*

Sangre de Cristo Communications, Inc.

2. Mailing Address *(Number, street, city, state, ZIP code)*

2200 Seventh Avenue
Pueblo, Colorado 81003

RECEIVED
JUL 23 1990
Federal Communications Commission
Office of the Secretary

Telephone No. *(Include Area Code)*
719-544-5781

3. PURPOSE OF APPLICATION:

[X] a. Additional time to construct broadcast station

[ ] b. Construction permit to replace expired permit

4. IDENTIFICATION OF OUTSTANDING CONSTRUCTION PERMIT:

File Number	Call Letters
BPTT-820413SI BMPTT-JA0702UF	K15BX
Frequency	Channel No.
	15

Station Location
Colorado Springs, Colorado

5. OTHER:

Submit as Exhibit No. N/A a list of the file numbers of pending applications concerning this station, e.g., major or minor modifications, assignments, etc.

6. EXTENT OF CONSTRUCTION:

(a) Has equipment been delivered? [ ] YES [X] NO

If NO, answer the following:

From Whom Ordered *(If no order has been placed, so indicate)*

No Order Placed

Date Ordered

Date Delivery Promised

(b) Has installation commenced? [ ] YES [X] NO

If YES, submit as Exhibit No. _____ a description of the extent of installation and the date installation commenced.

(c) Estimated date by which construction can be completed.

See Exhibit No. 1

7. (a) If application is for extension of construction permit, submit as Exhibit No. 1 reason(s) why construction has not been completed.

(b) If application is to replace an expired construction permit, submit as Exhibit No. _____ the reason for not submitting a timely extension application, together with the reason(s) why construction was not completed during the period specified in the construction permit or subsequent extension(s).

Are the representations contained in the application for construction permit still true and correct? [X] YES [ ] NO

If NO, give particulars in Exhibit No. _____

The APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Legal Name of Applicant	Signature
Sangre de Cristo Communications, Inc.	
Title: Pres.	Date: 7/17/90

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT, U.S. CODE, TITLE 18, SECTION 1001.

Sangre de Cristo
Communications, Inc.
FCC Form 307
Exhibit No. 1

Statement Concerning Construction

Sangre de Cristo Communications, Inc. ("SCC") is licensee of Television Station KOAA-TV, Pueblo, Colorado, and Television Translator Station K30AA, Colorado Springs, Colorado. KOAA-TV's ability to reach viewers in Colorado Springs is critial: it is the market's only NBC affiliate and additionally, presents an extensive schedule of syndicated programs as well a local news and informational programming. SCC relies on K30AA, which rebroadcasts the signal of KOAA-TV, to provide supplemental service in substantial portions of Colorado Springs.

There is a construction permit outstanding for Television Station KPCS(TV), channel 32, Pueblo, Colorado. If KPCS(TV) were to become operational, it could interfere with K30AA, and, because K30AA is a secondary facility under the terms of the Commission's rules, that station could be required to cease operations. SCC applied for the permit for K15BX in order to obtain the immediate ability to continue it critial service to Colorado Springs in the event it is forced to cease translator operations on channel 30.

However, the permittee of KPCS(TV) has been unable to obtain the financing necessary to commence operations or to sell its permit. SCC has attempted to purchase the permit and operate KPCS(TV) as a satellite of KOAA-TV (FCC File No. BAPCT-880226KH). However, its application for acquisition of KPCS(TV) was contested and denied by the Commission's staff, Memorandum

Opinion and Order, DA-88-2068 (M.M. Bur. January 13, 1989). SCC filed an Application for Review of that action on February 16, 1989. SCC's Application was again opposed and remains pending at the Commission.

SCC's inability to construct K15BX has thus been caused by "reasons clearly beyond the control of the permittee." 47 C.F.R. § 73.3534(b)(3). SCC sought the permit in order to supplement service to the largest community in its market, an integral part of its service area.[1/] However, the inability of the permittee of KPCS(TV) to construct as well as SCC's inability to acquire the permit have both prevented resolution of the question whether it will be necessary for SCC to implement its permit.[2/] Both factors are, of course, beyond the control of SCC.

Until the Commission resolves issues relating to SCC's proposed acquisition of SCC and the questions of implementation of the KPCS(TV) permit is resolved, SCC cannot rationally determine how to proceed with respect to the K15BX construction permit. Should KPCS(TV) commence operations, K15BX will afford SCC's only means of continuing to provide its current level of service to Colorado Springs. It is therefore critical to the public interest in service availability throughout a station's

---

1/ SCC's pleadings in connection with its attempt to acquire KPCS(TV) document the importance of Colorado Springs to KOAA-TV's ability to serve the public.

2/ It would, of course, be a needless waste of SCC's and the Commission's resources for SCC to construct the station when such construction may not be necessary if KPCS(TV) cannot commence operations.

principal market communities that SCC retain the construction permit for that station.

SCC respectfully submits that the importance of continued KOAA-TV service to Colorado Springs (which includes the market's only NBC network programming) mandates extension of the K15BX construction permit.

It should be noted, however, that SCC has recently completed negotiations with the University of Southern Colorado, licensee of Television Station KTSC, Pueblo, Colorado, looking toward construction and use of K15BX to rebroadcast KTSC's signal during a period prior to resolution of the status of KPSC(TV). It is thus anticipated that K15BX will be constructed and operated for the retransmission of KTSC in the near future.

EXHIBIT 6

DUPLICATE

Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0016
Expires 1/31/91

TRIPLICATE

...CATION FOR AUTHORITY TO CONSTRUCT OR
MAKE CHANG... V. ...NS...OR TV BOOSTER STATION
(Careful... TO FCC)

DUPLICATE

For Commission Fee Use Only		For Applicant Fee Use Only	
	FEE TYPE:	... ed with this application?	[X] Yes [ ] No
	FEE ...:	If No, indicate reason therefor (check one box):	[ ] Nonfeeable application
	ID...:	Fee Exempt (See 47 C.F.R. Section 1.1112)	[ ] Noncommercial educational licensee [ ] Governmental entity

For Commission Use Only
File No. BMPTT-900724IG

SECTION I - GENERAL INFORMATION

1. Name of Applicant	Address		
Sangre de Cristo Communications, Inc.	Box 195		
	City: Pueblo	State: CO	Zip Code: 81003
	Telephone No. (include area code): (719) 544-5781		

2. This application is for: (check one box)

[ ] Low Power Television [X] TV Translator [ ] TV Booster

(a) Proposed Channel No.	(b) Community to be served:	
15	City: Colorado Springs	State: CO

(c) Check one of the following boxes:

[ ] Application for **NEW** station

[ ] **MAJOR** change in licensed facilities, call sign: ____________

[ ] **MINOR** change in licensed facilities; call sign: ____________

[X] **MAJOR** modification of construction permit; call sign: K15BX

File No. of Construction Permit: BPTT-820413SI BMPTT-JA0702UF

[ ] **MINOR** modification of construction permit; call sign: ____________

File No. of Construction Permit: ____________

[ ] **AMENDMENT** to pending application; Application file number: ____________

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Sections I and VII and those other portions of the form that contain the amended information.

SECTION II - ENGINEERING DATA AND ANTENNA AND SITE INFORMATION

1. Facilities requested:

Output Channel No.	Transmitter Rated Power Output	Proposed Community(ies) to be served	
15	1.0 kilowatts	City Colorado Springs	State CO

Frequency Offset (check one)

[X] No offset [ ] Zero offset [ ] Plus offset [ ] Minus offset

Translator Input Channel No. 8

2. Proposed transmitting antenna location:

City	State	County
Colorado Springs	CO	El Paso

Address or other description of location:
K30AA Translator site on Cheyenne Mtn., SW of Colorado Springs, CO

Geographical coordinates of transmitting antenna to nearest second

North Latitude 38 ° 44 ' 42 " West Longitude 104 ° 51 ' 39 "

Attach as an Exhibit a map or maps (preferably topographic, if obtainable, such as Geological Survey quandrangles) of the area of the proposed transmitting antenna location shown drawn thereon the following data: Exhibit No. 1

a. Scale of kilometers
b. Proposed transmitting antenna location accurately plotted.

	Make	Type No.		Output Power P
3. Transmitter:	Television Technology Corp	XL 1000		1.000 kilowatts
4. Transmission line:	Andrews	HJ7-50	Length 125 Ft.	Rated efficiency E for length given (decimal fraction) .89

5. Transmitting antenna [X] Directional "off-the-shelf" [ ] Directional Composite (Multiple Antennas) [ ] Non-Directional

Manufacturer	Model	Description [1]
Scala	4 dr-16-2H	para panel

Orientation of main lobe [2]	Overall antenna structure height above ground [3]	Elevation of Site [4]	Power gain G (multiplier) in the horizontal lobe of maximum radiation relative to a halfwave dipole [5]
30° true	18.288 meters	2668.2 meters	8.55 (with 3° of downtilt)

Effective radiated power (ERP)
(ERP=P X E X G) 7.609 kilowatts

Height of antenna radiation center above ground 16.76 meters

Height of antenna radiation center above above mean sea level 2685.01 meters [6]

1 Give basic type using general descriptive terms such as half-wave dipole, "bow-tie" with screen, corner reflector, 10 element Yagi, 4 element in-phase array, two stacked 5 element Yagis, etc.

2 For directional antennas in the horizontal plane show the direction of the main radiation lobe(s) in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth.

3 Show overall height above ground in meters to topmost portion of structure, including highest top mounted antenna and beacon if any.

4 Show the ground elevation above mean sea level in meters at the base of the transmitting antenna supporting structure.

5 Give the actual power gain toward the radio horizon.

6 This is equal to the sum of the site elevation and the height of the antenna radiation center above ground.